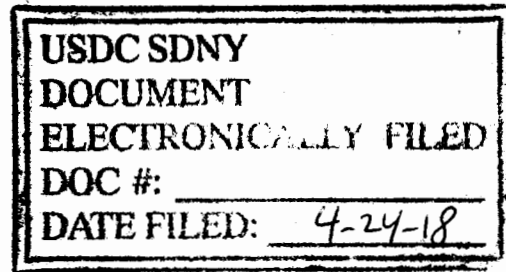


April 23, 2018

VIA ECF

Hon. John F. Keenan
United States District Court
Southern District of New York
500 Pearl Street, Room 1930
New York, NY 10007-1312



Re: *Wey v. NASDAQ, Inc.*, No. 1:18-cv-03405-JFK

Dear Judge Keenan:

Counsel for Plaintiffs and Defendants write jointly pursuant to Section 1(E) of Your Honor's Individual Practices to request the entry of a briefing schedule for Plaintiffs' forthcoming motion to remand and an adjournment of Defendants' deadline to answer or otherwise respond to the Complaint until after this Court rules on Plaintiffs' motion to remand.

This action was removed to this Court from the Supreme Court of New York, County of New York on April 18, 2018. Certain Defendants were served with the Complaint on April 9, 2018. Under Federal Rule of Civil Procedure 81(c)(2), those Defendants must respond to the Complaint in this removed action on or before April 30, 2018. Other Defendants were served with the Complaint on later dates and thus have a later response date.

Plaintiffs intend to file a motion to remand the case to state court. Accordingly, the parties jointly request the entry of a stipulated briefing schedule for Plaintiffs' motion to remand as follows: Plaintiffs will serve their motion to remand on June 15, 2018; Defendants will serve their opposition to the motion to remand on July 13, 2018; and Plaintiffs will serve a reply in support of the motion, and the parties will file the collected motion papers pursuant to Section 2(E) of Your Honor's Individual Practices, on July 27, 2018.

In addition, the parties jointly request that this Court stay Defendants' deadline to answer or otherwise respond to the Complaint until twenty-one (21) days after this Court rules on Plaintiffs' motion to remand. Finally, as part of this stipulated arrangement, all of the named defendants waive their objections to service of process.

There have been no previous requests for extensions of time in this case. Plaintiffs and Defendants jointly make this request. There is no prejudice to any party or undue delay caused by the requested briefing schedule and stay.

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We appreciate Your Honor's consideration of this request.

Respectfully,

/s/ Jonathan D. Lupkin (by permission)

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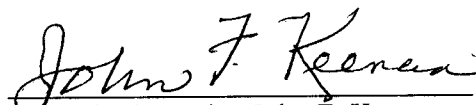
/s/ Douglas R. Cox

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Counsel for Defendants

SO ORDERED:

4/24/18


U.S. District Judge John F. Keenan